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15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
Ultimate Fighting Championship and UFC
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17
18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
22 others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

26 Defendant.
27
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS
A. WIDNELL IN SUPPORT OF
JOINT NOTICE OF THIRD
PARTY OBJECTION LETTERS
REGARDING CERTAIN THIRD
PARTY DOCUMENTS LISTED IN
THE PARTIES' EXHIBIT LISTS**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am admitted *pro*
3 *hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller Flexner LLP,
4 counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S. District Court for the
5 District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFL-PAL.
6

7 2. I make this declaration in support of the Joint Notice of Third Party Objection Letters
8 Regarding Certain Third Party Documents Listed in the Parties’ Exhibit Lists.

9 3. Based on my review of the files, records, and communications in this case, I have personal
10 knowledge of the facts set forth in this Declaration, and if called to testify, could and would
11 testify competently to those facts under oath.
12

13 4. On May 28th, Zuffa and Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
14 Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”) (collectively, “the Parties”), provided
15 notice to all third parties whose documents appear on the Parties’ exhibit list.

16 5. On June 12th, Parties received notice that one letter, addressed to Monte Cox, was
17 returned to sender after automatic mail forwarding expired.

18 6. The Parties sent the letter addressed to Monte Cox to the forwarding address on June 13th.

19 7. Certain third parties raised objections regarding certain third party documents included on
20 the exhibit list.
21

22 8. The Parties have met and conferred with parties who raised objections.¹

23 9. Attached as Exhibit A is a true and correct copy of WME/IMG, LLC’s Objection Letter
24 dated June 13, 2019.

25 ¹ The Parties and counsel for Golden Boy Promotions, Inc. and Golden Boy, LLC (“Golden
26 Boy”) were unable to find a time to meet and confer prior to filing the Joint Notice. Golden Boy
27 has indicated its intention to object and sent an Objection Letter to the Parties. The Parties have
28 attached that letter to this Declaration and intend to schedule a meet and confer with Golden Boy
as soon as is practicable.

1 10. Attached as Exhibit B is a true and correct copy of The Raine Group LLC's Objection
2 Letter dated June 14, 2019.

3 11. Attached as Exhibit C is a true and correct copy of Bellator Sport Worldwide LLC's
4 Objection Letter dated June 14, 2019.

5 12. Attached as Exhibit D is a true and correct copy of Top Rank, Inc.'s Objections to
6 Disclosure of Confidential Materials, dated June 14, 2019.

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8 13. Attached as Exhibit E is a true and correct copy of the Declaration of David J. Marroso In
9 Support of Top Rank Inc.'s Objections to Disclosure of Confidential Materials, dated June 14,
10 2019.

11 14. Attached as Exhibit F is a true and correct copy of Golden Boy's Objection Letter, dated
12 June 14, 2019.

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15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Washington, D.C.

17 By: /s/ Nicholas A. Widnell

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